

**Federal Defenders
OF NEW YORK, INC.**52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392David E. Patton
Executive DirectorSouthern District of New York
Jennifer L. Brown
Attorney-in-Charge

January 7, 2022

Ms. Stephanie Clifford


**RE: United States v. Michael Avenatti
19 Cr. 374 (JMF)**

Dear Ms. Stephanie Clifford,

Federal Defenders of New York, Inc., represents the above captioned individual in federal court in the Southern District of New York. Attached please find a trial appearance subpoena for your testimony on January 24, 2022, at 40 Foley Square in front of Judge Jesse M. Furman at 9:00 a.m. and for the duration of the trial. In addition to your trial testimony, we are requesting items **be produced in advance** of the January 24, 2022, trial date. Please see the enclosed subpoena rider with the requested items.

The requested items should be returned to Federal Defenders of New York, Inc., Attn: Ms. Anna Finkel, 52 Duane St., 10th Fl., New York, NY, 10007 or by email to anna_finkel@fd.org. You will not be required to be in court on January 24, 2022, but you will need to be available for the duration of the trial. Please contact me at (212) 417-8714 or Mr. Robert Baum, Esq. at (212) 417-8760 to discuss scheduling matters and your travel arrangements to testify at trial.

Sincerely,


Anna Finkel
Chief Investigator
(212) 417-8714

Enclosure

UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America)

v.)

Michael Avenatti) Case No. 19 Cr. 374 (JMF)

Defendant)

SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE

To: Stephanie Clifford

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place shown below to testify in this criminal case. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place of Appearance: 40 Foley Square,
Judge Jesse M. Furman

Courtroom No.: courtroom 1105

Date and Time: 01/24/2022 9:00 AM and for the duration
of trial

You must also bring with you the following documents, electronically stored information, or objects (blank if not applicable):

SEE RIDER



RUBY J. KRAJICK
CLERK OF COURT

[Signature]
Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing (name of party) Michael Avenatti
, who requests this subpoena, are:

Federal Defenders of New York, Inc.
Mr. Robert M. Baum, Esq.
52 Duane St., 10th Fl.
New York, NY 10007
(212) 417-8760
Robert_Baum@fd.org

Provide the following records:

**** Produce in advance of trial certified copies of the following items:**

provide any and all communications between Stephanie Clifford and Michael Avenatti between February 2018 – Present. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.

- provide any and all communications about or mentioning Michael Avenatti between February 2018 – Present. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.

- provide any and all communications between Stephanie Clifford and Luke Janklow or Sally Richardson between February 2018 – Present. This should include all text messages, instant messages, emails, letters, cards, voicemails, Facebook messages, WhatsApp messages, Instagram messages, and messages on similar platforms such as Signal or Telegram.

- provide any and all audio and video recordings and voicemails recorded between February 2018 – Present that include Michael Avenatti's voice.**

*The defendant is indigent and invokes Rule 17(b) F.R.CRIM. P, and as such is not responsible for records-related fees.**